Internal Letter

Rockwell International

Date . 31 July 1989

No. . 89EU-222

TO:
. R. L. Gay
. Rocketdyne-SSFL
. 635, 055-T006

FROM:
. G. S. Taylor
. Rocketdyne-SSFL
. 543, 055-T485
. 393-6193

Subject . Sodium Burn Facility Environmental Compliance Audit

On 27 July 1989, an internal environmental compliance audit was conducted at the SSFL Sodium Burn Facility, B/133, in accordance with the Rocketdyne Environmental Control Manual (ECM), Section 01.60. The following discrepancy conditions must be corrected immediately:

1. Inadequate identification and labeling of containers. Five steel open-top 55-gallon drums were stenciled "empty". Of these, three were discovered to contain several pounds of an unknown power (Na_2O?) and two contained metal piping with sodium residues. In addition, two five-gallon plastic containers were found to contain soil and debris contaminated with kerosine. These drums are highly suspected to be hazardous waste and, as such, require a completed hazardous waste Form 642J. All containers, product and waste, must be labeled as to the contents.

Since the DOE-owned/Rockwell-operated hazardous Waste Management Facility Operation Plan and permit application is currently submitted for regulatory review, the following corrective actions are required:

1. Of the eight 55-gallon containers of fire suppression carbonate powder stored in the area, several appeared either to be contaminated or spent. If such is the case, the material should be replaced with fresh product and properly disposed of.

2. All waste storage tanks (Tk-1, Tk-2, Tk-3) should be labeled with a 642J or equivalent hazardous waste label indicating, at a minimum, the composition, physical state, and hazards associated with the waste.

3. A record/log sheet should be utilized to accurately record and track the disposition of all hazardous waste (including tanks) managed at the facility including the following minimum information:

   a. Unique waste container identification number

   b. Date waste is received

   c. Form 642J information: date of first accumulation, generating area/department, composition, etc.

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d. Date waste is treated

e. Final disposition - fully treated? Residues disposed of as non-regulated waste? hazardous waste? etc.

4. Upgrade emergency equipment to include:

a. An internal/external phone line extension immediately accessible to both operating personnel and by personnel outside the main gate.

b. An audible emergency alarm tied to Protective Services activated by pull switch immediately accessible to both operating personnel and outside personnel.

c. Centralize and increase identification of emergency equipment including fire suppression equipment and supplies, personal protection supplies, spill control manterial, etc.

Please call the undersigned regarding any questions or assistance.

G. S. Taylor
Environmental Unit

GST/sj-0950H

cc: G. B. Colbert 543, 055-T485
G. G. Gaylord 622, 055-DA11
D. C. Gibbs 638, 055-HB13
J. H. Keller 540, 055-T486
B. L. Kephart 543, 055-T485
S. R. Lafflam 543, 055-T485
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J. T. Nagamatsu 597, 055-AA24
F. G. Schmidt 635, 055-T006

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ENVIRONMENTAL COMPLIANCE AUDIT FORM

Inspection Site Sodium Burn Location SSFL-B/133 Date 7/27/89 Time 930A

HAZARDOUS WASTE/INDUSTRIAL WASTE:

HW Container Accum. ___ HW Tank Storage X HW Container Storage X HW Treatment X

Hazardous Waste Containers ___ N/A	Yes	No	Remarks
1. Are Containers stored in this area?	X		
2. Are Containers properly labeled (Form 642J-2)?		X	
a. Accumulate Start Date	X		
b. "Hazardous Waste"	X		
c. Common waste name	X		
d. Composition of Waste		X	
e. Physical State of Waste	X		
f. Container type	X		
g. Hazardous Properties of Waste	X		
h. Generating Department	X		
i. Waste Generating Process		X	
3. Are Containers in good condition?	X		
4. Are Containers closed?		X	NOT SEALED
5. Are appropriate DOT containers used	X		
6. Are Containers stored <90 days		X	
7. How many containers are stored NINE			
8. How many tanks are stored? TK 1, TK 2, TK 3			

Container Storage Areas (HWSA PCB & Storage Areas)			
1. Is the storage area secured-locked?	X		
2. Are filled waste containers stored on the pad?	—	—	N/A
3. Is adequate aisle space maintained?	X		
4. Are containers on correct pads?	—	—	N/A
5. Are wastes stored compatible?	X		
6. Are the pads in good repair free of leaks or liquids?	—	—	N/A
7. Are the pad drain valves closed?	—	—	N/A
8. Are weekly self inspection records current?	X		
9. Are container logs current?	X		
10. Is safety equipment available and in use?	X		
11. Are containers stored beyond permitted time?		X	

AIR POLLUTION: SCAQMD Permitted Equipment ___ VAPCD Permitted Equipment X

1. Are air pollution permits posted?	X		
2. Are required records up-to-date?			
3. Are operations in compliance with permit conditions?	X		
4. Are solvent usage logs filled out and up to date?	—	—	N/A

5. List Permit Nos. ___

6. Location of asbestos in area, if any ___

WATER POLLUTION:

L.A. Bureau of Sanitation ___ NPDES Permit ___ RWQCB ___

1. Are pretreatment systems operating properly?	—	—	N/A
2. Are discharged wastewaters in compliance?	—	—	N/A

3. List Sources: ___

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Hazardous Commodity Storage

1. Are hazardous or regulated chemicals stored? _____
   Type & Quantity Stored _____

2. Are the chemicals properly stored

	YES	NO	N/A
a. Properly labeled	—	—	—
b. Properly containerized	—	—	—
c. Palletized	—	—	—
d. Incompatible materials segregated	—	—	—

3. K-bottle/pressurized cylinder storage
   Type and Quantity Stored _____

4. Are the pressure cylinders properly stored?

	YES	NO	N/A
a. Properly labeled	X	—	—
b. Properly restrained	X	—	—
c. Incompatible material segregated	X	—	—

5. Are personnel properly trained? If not, courses required.

Remarks: SEE ATTACHED LETTER - IMPROPER USE OF 642J, IMPROPER STORAGE OF WASTE NaOH

Follow up actions required: SEE ATTACHED LETTER

Auditor Name GLENN S. TAYLOR Title ENV. ENG. Signature Glenn S. Taylor

Area Contact RICHARD GAY Title MANAGER Dept. 635

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